

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**VOLKSWAGEN GROUP OF AMERICA, INC.,**

**Plaintiff,**

**v.**

**THE UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE A,**

**Defendants.**

**Civil Action No. 1:19-cv-01574-AJT-MSN**

**PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION**

Plaintiff Volkswagen Group of America, Inc., by counsel, and pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65, by counsel, hereby moves for entry of a preliminary injunction.

For the reasons set forth in Plaintiff's accompanying memorandum, Plaintiff respectfully requests that this Court issue a preliminary injunction freezing the respective PayPal accounts of the Defendants identified in Schedule A to the Complaint.

Date: January 14, 2020

Respectfully submitted,

/s/ Monica Riva Talley

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